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October 15, 2021

The Honorable Christopher J. Burke United States District Court 844 N. King Street Wilmington, DE 19801 VIA ELECTRONIC FILING

Re: Bear Box LLC, et al. v. Lancium LLC, et al.,

C.A. No. 21-534-MN-CJB

Dear Judge Burke:

I write on behalf of Plaintiffs in connection with Paragraph 8 of the Scheduling Order (D.I. 35) and the Court's September 13, 2021 Oral Order (D.I. 59) about whether any patent claim terms require construction in this case.

At this time, Plaintiffs do not expect that they will ask the Court to construe any claim terms in this case based on the Plaintiffs' current understanding of the issues in the case and Defendants' contentions disclosed to date. The parties are continuing to engage in fact discovery.

While Plaintiffs do not anticipate that claim construction will be necessary, if further developments in the case suggest otherwise, Plaintiffs will advise the Court as soon as possible. Should the Court have any questions, counsel is available at the Court's convenience.

Respectfully,

/s/ Andrew C. Mayo

Andrew C. Mayo (#5207)

cc: All counsel of record (via electronic mail)